

AARON D. FORD
Attorney General
MICHAEL J. BONGARD (Bar. No. 7997)
Senior Deputy Attorney General
State of Nevada
Office of the Attorney General
1539 Avenue F, Suite 2
Ely, NV 89301
(775) 289-1632 (phone)
(775) 289-1653 (fax)
mbongard@ag.nv.gov
Attorneys for Respondents

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RANDOLPH L. MOORE,

Petitioner,

vs.

JEREMY BEAN, *et al.*,

Respondents.

Case No. 2:13-cv-00655-JCM-DJA

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE THE
OPPOSITION TO THE MOTION TO ALTER
OR AMEND JUDGMENT
(ECF NO. 186) (FIRST REQUEST)
(DEATH PENALTY CASE)**

Respondents, through legal counsel, Aaron D. Ford, Attorney General of The State of Nevada, and Michael J. Bongard, Senior Deputy Attorney General, hereby move this court for an enlargement of time to file the opposition to the motion to alter or amend judgment filed by Petitioner Randolph Moore (Moore) in this matter. ECF No. 186. Respondents request an enlargement of time of forty-five (45) days, until November 20, 2025. The response is currently due October 6, 2025.

This is Respondents' first request for an extension of time in which to file the opposition to the motion and made in good faith and not for purposes of delay and based upon the unforeseen circumstances described below.

DATED this 26th day of September 2025.

AARON D. FORD
Attorney General

By: /s/ Michael J. Bongard
MICHAEL J. BONGARD (Bar No. 007997)
Senior Deputy Attorney General

DECLARATION OF MICHAEL J. BONGARD

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2 1. I am a Senior Deputy Attorney General employed by the Attorney General's Office of the
3 State of Nevada in the Post-Conviction Division, and I make this declaration on behalf of Respondents'
4 Motion for Enlargement of Time to file the opposition to the motion to alter or amend judgment (ECF
5 No. 186), filed in the above-captioned case. I am requesting an enlargement of forty-five (45) days, up
6 to and including November 20, 2025. The response is currently due October 6, 2025.

7 2. When Moore filed the motion to alter or amend on September 22, 2025, Counsel was out-
8 of-state on annual leave. Counsel returned to the office on Thursday, September 25, 2025. Since
9 Counsel's return, he has been preparing for a preliminary hearing on Wednesday, October 1, 2025, in a
10 murder case. Counsel reviewed Moore's motion and requested the materials from his staff that are needed
11 to response to the motion, since the Attorney General's Office is still hampered by the effects of the
12 cyber-attack late last month.

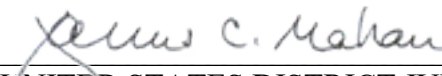
13 3. Counsel reached out to Moore's counsel, Randolph Fiedler, Stacy Neuman, and Hannah
14 Nelson on September 26, 2025, to determine their position on Respondents' request for an enlargement
15 of time. Mr. Fiedler responded by e-mail stating that he did not oppose the request.

16 Counsel believes that the above-stated reasons constitute unforeseen circumstances which provide
17 justification for this unopposed request for a forty-five (45) day enlargement of time from October 6,
18 2025, to November 20, 2025, to file the opposition to the motion to alter or amend filed in this matter.

19 DATED this 26th day of September 2025.

20
21 By: /s/ Michael J. Bongard
22 MICHAEL J. BONGARD (Bar No. 007997)
23 Senior Deputy Attorney General

24 **IT IS SO ORDERED:**

25
26 
27 UNITED STATES DISTRICT JUDGE

28 Dated: September 30, 2025

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 26th day of September, 2025, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE THE OPPOSITION TO THE MOTION TO ALTER OR AMEND JUDGMENT (ECF NO. 186) (FIRST REQUEST)**, by U.S. District Court CM/ECF electronic filing to:

Randolph Fiedler
Assistant Federal Public Defender
Stacy M. Newman
Assistant Federal Public Defender
Hannah D. Nelson
Assistant Federal Public Defender
411 E. Bonneville Ave., Ste. 250
Las Vegas, NV 89101
Randolph_fiedler@fd.org
Stacy_Newman@fd.org
Hannah_@fd.org

/s/ Amanda White